

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Doctor Michael Moates

Case No.: 22-cv-04478-JD

Licensed Psychologist

Plaintiffs

PLAINTIFF MICHAEL

v.

MOATES' MOTION FOR

META PLATFORMS, INC.

LIMITED DISCOVERY

DBA: Facebook, Instagram, Meta Quest

(Oculus), Facebook Messenger, Whatsapp

Defendants

JURY TRIAL DEMANDED

1. Plaintiff, respectfully moves this Honorable Court for an order permitting limited discovery in response to Defendant Facebook Inc.'s anticipated motion to dismiss.
2. As grounds for this motion, Plaintiff states as follows:
 - a. Defendant Facebook Inc. intends to file a motion to dismiss, seeking to have this case dismissed without discovery.
 - b. The proposed discovery is limited in scope and will not unduly burden Defendant.
 - c. The requested discovery is necessary for Plaintiff to oppose the motion to dismiss and to determine whether Plaintiff can assert additional claims against Defendant.
 - d. The requested discovery will be directly relevant to the issues raised in Defendant's motion to dismiss.

- e. Plaintiff has been unable to obtain the necessary information from Defendant through other means.
3. Plaintiff seeks to obtain the following discovery:
- a. Interrogatories limited to the issues raised in Defendant's motion to dismiss;
 - b. Requests for production of documents relevant to the issues raised in Defendant's motion to dismiss;
 - c. Depositions related to the issues raised in Defendant's motion to dismiss.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this motion for limited discovery and issue an order compelling Defendant to provide responses to the discovery requests listed above.

Respectfully submitted,

/s/ Michael Moates

Michael Moates, Pro se

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